



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 1, 2023

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Tyrome Brehon*, 23 Cr. 555 (JPC)

Dear Judge Cronan:

The parties respectfully request that the Court schedule an initial conference and arraignment in the above case for November 7, 2023 at 3:30 p.m.

The Government respectfully requests that the time between today and the date of arraignment be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). Although it is the Government's position that the Speedy Trial clock does not begin to run until the date the defendant is arraigned, out of an abundance of caution, the Government seeks the proposed exclusion between today and the date of the arraignment. The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the Government time to assemble and produce discovery, the defendant time to review such discovery, and the parties an opportunity to discuss the possibility of pretrial resolutions of this case. Defense counsel has informed the Government that it consents to this request.

The initial conference and arraignment will be held on November 7, 2023, at 3:00 p.m. in Courtroom 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007. The Court will exclude time until November 7, 2023, under the Speedy Trial Act to allow the Government time to assemble and produce discovery, the Defendant time to review such discovery, and the parties an opportunity to discuss the possibility of pretrial resolutions of this case. The Court finds that the ends of justice served by that exclusion outweigh the best interest of the public and the Defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

cc: Sylvie Levine, Esq. (via ECF)

SO ORDERED.
November 2, 2023 New
York, New York

JOHN P. CRONAN
United States District Judge

Respectfully submitted

DAMIAN WILLIAMS
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Southern District of New York

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